

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Case No. 25-cv-11472

President and Fellows of Harvard College,)
Plaintiff,)
v.)
Pam Bondi, Et All,)
Defendants.)

IN COURT OF MASS.
DISTRICT OF MASS.
FILED
2025 JUL 23 PM 12:16
CLERK'S OFFICE

**MOTION FOR HEARING ON AFRASIABI'S BREIF AMICUS CURIAE ON
HARVARD'S RIGHTS ABUSES**

Now comes Kaveh Afrasiabi, Pro Se, and pursuant to the federal rules of civil procedure moves the honorable court to hold a hearing on Afrasiabi's Brief Amicus Curiae in opposition to the Plaintiff's motion for summary judgment.

As grounds for this Motion, Afrasiabi states the following:

- (a) There is irrefutable evidence that the Plaintiff Harvard University abuses its power and influence to trample up and to repress the rights of those who dare to criticize the university, as has been the case with the egregious violation of Afrasiabi's civil and

constitutional rights by Harvard and its police department, in retaliation against Afrasiabi's whistleblowing on Harvard's financial ties to the opponents of author, Salman Rushdie; as indicated in the Brief, identified on the case's docket sheet as number 183, even the former Massachusetts US Senator John Kerry has urged the Department of Justice to investigate Harvard over its mistreatment of Afrasiabi.

(b) As of this moment, Afrasiabi's Brief is the only brief filed in this case in opposition to Harvard, in contrast to numerous pro-Harvard amicus briefs filed by its vast network of supporters. Hence, to level the playing field and to maintain judicial balance with respect to the opposing views on Harvard, it is imperative to give the dissident views such as Afrasiabi's the opportunity to be heard, instead of allowing a monopoly of discourse favoring the mighty Goliath, Harvard, that is often treated as if above the law and the reach of US Constitution.

In conclusion, Harvard has maliciously engaged in the unlawful misconduct of violating the human and civil rights of Afrasiabi with impunity for years and must be brought to justice.

Respectfully Submitted,



Kaveh L. Afrasiabi, Pro Se

Certificate of Service: A true copy of this Motion has been served upon the counsel representing the Plaintiff Harvard University, on this date, July 21, 2025, under the pains and penalties of perjury.